

FILED

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EVANSVILLE, INDIANA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Cause No. 2:11-cr- 37-JMS-CMM
)
CONSTANTINO CEJAS,) -01
a.k.a. "Tino",)
a.k.a. "The Don", and)
NICHOLAS CEJA,) -02
)
Defendants.)

INDICTMENT

COUNT ONE

The Grand Jury charges that:

Beginning in or around November 2010, the exact date being unknown to the Grand Jury, and continuing up to and including March 2011, in the Southern District of Indiana, Terre Haute Division, and elsewhere, CONSTANTINO CEJAS, a.k.a. "Tino", a.k.a. "The Don", NICHOLAS CEJA, defendants herein, did knowingly conspire together and with diverse other persons, known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Non-Narcotic Controlled Substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, that is to possess with the intent to distribute and to distribute methamphetamine, the members of the conspiracy did commit, among others, the following overt acts:

1. On February 8, 2011, CONSTANTINO CEJAS and another individual supplied an individual known to the Grand Jury with an amount of methamphetamine. CONSTANTINO CEJAS was armed with a handgun when he possessed with intent to distribute and distributed the methamphetamine.
2. On February 14, 2011, CONSTANTINO CEJA and NICHOLAS CEJAS distributed four ounces of methamphetamine to an individual known to the Grand Jury for \$8000 United States currency. CONSTANTINO CEJAS and NICHOLAS CEJA possessed loaded handguns.

COUNT TWO

The Grand Jury further charges that:

On or about February 8, 2011, within the Southern District of Indiana, Terre Haute Division, CONSTANTINO CEJAS, a.k.a. "Tino", a.k.a. "The Don", defendant herein, did knowingly possess with the intent to distribute and distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Non-Narcotic Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT THREE

The Grand Jury further charges that:

On or about February 8, 2011, in the Southern District of Indiana, Terre Haute Division, CONSTANTINO CEJAS, a.k.a. "Tino", a.k.a. "The Don", defendant herein, did knowingly possess a firearm in furtherance of the drug trafficking crime specified in Count Two of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

The Grand Jury further charges that:

On or about February 14, 2011, within the Southern District of Indiana, Terre Haute Division, CONSTANTINO CEJAS a.k.a. "Tino", a.k.a. "The Don", and NICHOLAS CEJA, defendants herein, did knowingly possess with the intent to distribute and distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Non-Narcotic Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FIVE

The Grand Jury further charges that:

On or about February 14, 2011, in the Southern District of Indiana, Terre Haute Division, CONSTANTINO CEJAS, a.k.a. "Tino", a.k.a. "The Don", and NICHOLAS CEJA, defendants herein, did knowingly possess firearm(s) in furtherance of the drug trafficking crime specified in Count Four of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT SIX

The Grand Jury further charges that:

On or about March 15, 2011, in the Southern District of Indiana, Terre Haute Division, CONSTANTINO CEJAS, a.k.a. "Tino", a.k.a. "The Don", defendant herein, did knowingly possess in and affecting commerce, a firearm, to wit: a Lorcin 9 MM semiautomatic handgun bearing serial number L081597, being an alien illegally and unlawfully in the United States, in violation of Title 18, United States Code, Section 922(g)(5).

FORFEITURE

1. The allegations in Counts One through Six of this indictment are realleged as if fully set forth here, for the purpose of giving the defendants notice of the United States' intent to seek forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

2. If convicted of any of the offenses set forth in Counts One through Six, CONSTANTINO CEJAS, a.k.a. "Tino", a.k.a. "The Don", and NICHOLAS CEJA defendants herein, shall forfeit to the United States any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses of which he or she is convicted, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses of which he or she is convicted. This includes, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any of the offenses of which he or she is convicted. Such property includes, but is not necessarily limited to, the

following specific items:

- a Lorcin 9 MM semiautomatic handgun bearing serial number L081597 seized from CEJAS on or about March 15, 2011;
- a 9mm firearm seized from CEJAS and CEJA on or about February 14, 2011;
- \$8000 United States currency seized from CEJAS and CEJA on or about February 14, 2011.

A TRUE BILL: 

FOREPERSON

JOSEPH H. HOGSETT
United States Attorney

by: 

Matthias D. Onderak
Assistant United States Attorney